

Exhibit LL

**NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JAMES BLAKES, STEVEN CLARK,
HERMAN DECKYS, BRADLEY HUNT,
PHILLIPE PORTER, ERNEST ROBERTS,
JR., LARRY WILLIAMS, for themselves and
on behalf of similarly situated others,

Plaintiffs,

v.

ILLINOIS BELL TELEPHONE COMPANY
d/b/a AT&T Illinois,

Defendant.

Case No. 11-cv-336

Magistrate Judge Kim

Declaration of Keith Harn

I, Keith Harn, hereby submit this Declaration and state as follows:

1. I am currently employed by Illinois Bell Telephone Company as an Area Manager in Engineering. I previously served as an Area Manager in the Construction & Engineering Department.

2. As I explained in the deposition that I gave in this case, I do not believe discipline or the threat of discipline is used as a tool to increase employees' productivity.

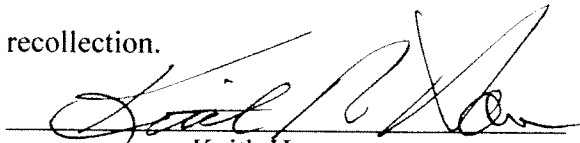
3. As I also explained in my deposition, managers are supposed to coach employees when their performance is below expectations to help them improve on their job.

4. It has been my experience that although managers retain discretion in this area, it typically takes sustained, consistently below-expectations performance before an employee is subject to more formal discipline and termination.

5. In particular, with respect to employee efficiency, an employee generally would have to be ranked in the bottom quintile for multiple months without responding to coaching or

feedback or attempts to improve before an employee receives a verbal warning or is suspended or terminated.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge and recollection.


Keith Harn